

**UNITED STATES DISTRICT COURT**  
for the  
**District of Oregon**

United States of America	)	
v.	)	
	)	Case No. 3:23-mj-11
Kelley Ray Kaighin	)	
	)	
	)	
	)	

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*Defendant(s)*

**CRIMINAL COMPLAINT  
BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 18, 2023 in the county of Marion in the  
District of Oregon, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. 841(a)(1), 841(b)(1)(A)	Possession with the intent to distribute 1000 grams or more of a mixture and substance containing a detectable amount of heroin a Schedule I controlled substance, and possession with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl a Schedule II controlled substance.

This criminal complaint is based on these facts:

See attached affidavit of Drug Enforcement Administration (DEA) Special Agent Samuel Landis.

Continued on the attached sheet.

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/s/ By Phone

*Complainant's signature*

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Samuel Landis, Special Agent, DEA

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
telephone at 10:28 a.m./YXXX

Date: January 19, 2023

City and state: Portland, Oregon



*Youlee Yim You*

*Judge's signature*

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Hon. Youlee Yim You, U.S. Magistrate Judge

*Printed name and title*